

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

APR 17 1996

In the Matter of )  
 )  
Telecommunications Services ) CS Docket No. 95-184  
Inside Wiring )  
 )  
Customer Premises Equipment )

DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS OF SBC COMMUNICATIONS INC.**

SBC Communications Inc., by and through its attorneys, on behalf of its subsidiaries, Southwestern Bell Telephone Company ("SWBT") and Southwestern Bell Video Services ("SBVS") (referred to herein collectively as "SBC") hereby submits its Reply Comments in response to the Notice of Proposed Rulemaking (the "NPRM")<sup>1</sup> and Comments filed in this docket on March 18, 1996.

**I. IT IS PREMATURE TO TAKE FINAL ACTION ON THE ISSUES RAISED IN THIS PROCEEDING.**

SBC agrees with the Comments filed by the Cable Telecommunications Association ("CATA") and others<sup>2</sup> that this docket is actually more akin to a Notice of Inquiry than an NPRM. The document at issue raises more than 75 broad and interrelated

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<sup>1</sup> Notice of Proposed Rulemaking, FCC 95-504 (released January 26, 1996).

<sup>2</sup> See, e.g., Comments of Tele-Communications, Inc. ("TCI") (p. 8).

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issues involving inside wire, telecommunications and customer premises equipment (“CPE”). The Commission’s suggestions on revising its policies in these areas are based in part on its theoretical projections regarding the convergence of technology for telephony and cable services. No specific rules are proposed; rather, interested parties are asked to make general comments on a broad array of theoretical questions.

SBC supports several commentators who suggest that it is too early to adopt rules in the areas addressed in this docket.<sup>3</sup> Policies and rules regarding these issues should be driven by the marketplace, not dictated by the Commission. As noted by the commentators, implementation of the Telecommunications Act of 1996 (the “Act”) will dramatically change the telecommunications industry. Over the next year or so, the Commission faces a task of overwhelming importance as it performs functions envisioned by the Act. As the Commission is well aware, Congress mandated many specific rulemakings that the Commission must address within certain time frames. The Commission has a finite amount of resources; and SBC respectfully recommends that for at least the remainder of this year, the Commission devote all its resources and efforts to the critical proceedings specifically required in connection with the Act.

Moreover, implementation of the Act will affect the issues raised in this proceeding. If specific standards are adopted now, the standards may be outdated by the

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<sup>3</sup>See, e.g., Comments of TCI (p. 2-6); Charter Communications, Inc. and Comcast Cable Communications, Inc. (p. i, iv); Continental Cablevision, Inc. and Cablevision Systems Corporation (p. 6, 29); National Cable Television Association, Inc. (“NCTA”) (p. 4, 21-29); Cable Telecommunications Association (“CATA”) (p. i, 1-2, 13-16); and Cox Communications, Inc. (p. 8).

time cable and telephone technologies converge and the new standards become applicable. There is also a risk that adoption of many of the proposals set forth in the NPRM could dictate the pace and direction of technological convergence and thereby restrict, rather than promote, competition. Such a result is directly contrary to the overriding purpose of the Act.

Thus, SBC agrees with the commentators referenced herein that the Commission should defer addressing the issues raised in this docket until they can be incorporated with other rulemakings that are required by the Act and until there is empirical data regarding the extent and shape of convergence in the market for broadband services. At most, the Commission should use the Comments received to develop and propose specific rules and regulations. After specific rules and regulations have been developed, the Commission should seek comment from interested parties.

**II. THE COMMISSION CAN BEST FACILITATE COMPETITION BY ENCOURAGING THE MARKET TO OPERATE THROUGH NEGOTIATION, RATHER THAN REGULATION.**

In the event the Commission decides to make specific rules in this docket, the Commission's overriding goal should be flexibility. Service providers must be allowed to negotiate with their customers to obtain the best solution given the particular circumstances. The principle of negotiation must be applied in at least the following three areas: (i) determination of the appropriate demarcation point; (ii) determination of technical standards; and (iii) rules regarding exclusive contracts.

**A. Rules for Demarcation Point.**

SBC agrees with BellSouth<sup>4</sup> that the Commission should allow service providers and property owners to engage in negotiation and compromise to determine the location of the demarcation point(s) in multiunit premises.<sup>5</sup> The optimal location for a demarcation point depends on the nature of the building, what services are provided and the customer's preference. It is unreasonable to adopt uniform rules for all kinds of property, since there are substantial differences between residential and commercial buildings and within commercial buildings themselves. The Commission should allow flexibility so the demarcation point may be placed in the best location given the nature of the premises and the particular circumstances involved, taking into account the property owner's needs. The evolution of technology will increase the need for flexibility in this area.

The concept of negotiation guides the telephone demarcation rules today.<sup>6</sup> The Commission's current telephone inside wire rules permit building owners and

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<sup>4</sup>See Comments of BellSouth Corporation and BellSouth Telecommunications, Inc. ("BellSouth") (p. 3, 6).

<sup>5</sup> As used herein, multiunit premises refers to anything other than a single family dwelling. SBC believes the FCC should not change the current demarcation rules for cable service in single family dwellings. The current cable demarcation rules for single family dwellings offer administrative and operational efficiencies and minimize customer confusion.

<sup>6</sup> The inside wire rules for telephone service are found at 47 C.F.R. § 68.3 (1994).

telephone service providers to negotiate to determine a mutually satisfactory telephone demarcation point.

In the event the Commission decides to implement specific demarcation rules, SBC would emphasize two critical concerns. First, any rules must apply equally to all service providers. Second, it is essential to allow telephone companies at least as much access to customers as allowed by the current rules.

In the NPRM, the Commission recognizes the risks of changing the demarcation rules for telephony.<sup>7</sup> SBC has serious concerns about moving the telephone demarcation point outside customer premises. Specifically, in multiunit premises, forcing telephone companies to move outside could have an extremely negative impact on the quality of telephone service. In order to properly serve its customers, telephone companies must have the opportunity to terminate service in a secure location. Forcing the demarcation point outside would add the risks of impaired service due to weather and the elements. Further, in order for many services to operate, commercial power must be accessible at the demarcation point which would not be possible if the demarcation point were pushed outside. Thus, moving the telephone demarcation point back would create a risk that telephone service would be severely degraded. In short, the Commission should not impose specific rules regarding demarcation but should allow service providers and property owners in multiunit premises to negotiate to determine the optimal location.

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<sup>7</sup> Specifically, the Commission states that it is not inclined to change the rules for telephony to match the cable rules thereby pushing the telephone demarcation point farther away from the customer. NPRM at para.13.

**B. Rules Regarding Technical Standards.**

SBC agrees with the preponderance of Comments filed in this docket that the marketplace and the industry should be the driving force in determining whether and what type of technical standards should apply in the area of connections.<sup>8</sup> The telecommunications industry has already established standards that are widely followed. The Commission should not substitute its judgment for that of the industry in this technical area.

As noted by the commentors, competitive market forces can best determine the appropriate standards. The natural operation of the marketplace will reward high quality service providers and eliminate inferior providers. Moreover, if competition does not operate as anticipated and overall quality suffers, the Commission can then consider other options which may be in the public interest.

**C. Rules Regarding Exclusive Contracts.**

A number of parties made comments addressing whether service providers should be permitted to enter into exclusive contracts with property owners for provision of services.<sup>9</sup> The Commission should not dictate rules in this area. Whether or not to enter into an exclusive arrangement is a matter of private contract between the service

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<sup>8</sup>See, e.g., Comments of NCTA (p. 35); Building Industry Consulting Service International (p. 3); Ameritech (p. 16); NYNEX (p. 17); Pacific Bell and Pacific Telesis Services (p. 9); DIRECTV, Inc. (p. 11); Time Warner Cable and Time Warner Communications (p. iv).

<sup>9</sup>See, e.g., Comments of OpTel, Inc. (p. 8); Independent Cable & Telecommunications Association (p. 6).

provider and the property owner. The parties involved should be allowed the freedom to exercise their own choice in this area. There is no legitimate reason for the Commission to disturb that freedom of choice with unnecessary regulation.

### **III. CONCLUSION**

For the foregoing reasons, SBC submits that the Commission should defer taking action in this docket at this time. The Commission can best facilitate competition by encouraging the market to operate through negotiation, rather than regulation. The Commission should not mandate a demarcation point for multiunit premises, whether or not the point is common to cable and telephony services or specific to either service. SBC supports flexibility with respect to demarcation rules for multiunit premises and allowing service providers to negotiate with customers to determine the optimal location given the particular circumstances. Similarly, the Commission should rely on the

industry to develop connection standards for industry-wide application. Finally, the Commission should not suppress freedom of contract by regulation and/or prohibition of exclusive contracts.

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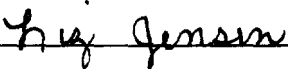
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**CERTIFICATE OF SERVICE**

I, Liz Jensen, hereby certify that the foregoing  
Reply Comments of SBC Communications, Inc., in CS Docket No.  
95-184, have been served this 17th day of April, 1996 to the  
Parties of Record.

  
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